

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:18-CR-00452-FL-1

UNITED STATES OF AMERICA)
v.)
LEONID ISAAKOVICH TEYF)
)
UNOPPOSED MOTION TO EXTEND
DEADLINES SET FORTH IN 23 AUGUST
2019 ORDER RE: MOTION TO COMPEL

Defendant, Leonid Isaakovich Teyf, by and through counsel, hereby moves the Court to extend the deadlines established in the Court’s 23 August 2019 Order (DE 322) relating to the Government’s Motion to Compel Response (DE 245) to its February 22, 2019 Grand Jury subpoena.

1. At the conclusion of the August 23, 2019 hearing on the Government's Motion to Compel, the Court ordered that the Government produce all outstanding digital evidence to Defendant Teyf's counsel no later than August 30, 2019. (DE 322). The Court further ordered that, no later than September 30, 2019, Teyf's counsel (a) review the digital evidence and consult with Defendant Teyf to determine whether he will persist in his 5th and 6th Amendment objections to the Grand Jury subpoena, (b) propose a timeline for production of documents responsive to the subpoena, in the event that the Court grants the Government's Motion to Compel, and (c) file a brief notice with the court regarding Defendant Teyf's position on these issues. The Court indicated that counsel for Defendant Teyf could apply to the Court for additional time to complete these tasks if necessary.

2. The digital evidence was produced to Defendant Teyf's counsel on August 30, 2019. Counsel for Defendant Teyf made arrangements for transfer of the materials to an outside vendor. As previously indicated, the amount of data involved is between 4-5 terabytes (TB)

(equivalent to tens of millions of pages of documents). The amount of time to upload and review the data is commensurately substantial and still ongoing. The process of making all of the data searchable is still being completed. Counsel for Defendant Teyf need additional time to complete that process and review the voluminous digital materials in order to comply with the Court's Order of August 23, 2019.

3. Accordingly, counsel for Defendant Teyf request an additional thirty (30) days, to and including October 30, 2019, for that purpose.

4. Since the August 23 hearing and Order, the Court has issued a revised schedule (DE 334), moving the trial to March 16, 2020.

5. The Government, through Assistant United States Attorney Barbara D. Kocher, does not object to the requested extension.

6. This Motion is made in good faith and not for purposes of delay. Neither the Government nor the defendant would be prejudiced by the continuance sought herein.

7. Defendant Teyf consents to the exclusion of any period of delay caused by this motion from the calculations under the Speedy Trial Act.

WHEREFORE, Defendant Leonid Isaakov Teyf, respectfully requests that the deadline for complying with the Court's 23 August 2019 Order be extended for 30 (thirty) days, to and including October 30, 2019.

Respectfully submitted, this the 27th day of September, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2019, I electronically filed the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINES SET FORTH IN 23 AUGUST 2019 ORDER RE: MOTION TO COMPEL** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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